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6 | Attorney for ISAIAH OUTLAW

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2:10-cr-00455-PMP-LRL

**MOTION AND ORDER TO EXTEND
MARCH 4, 2012 SELF SURRENDER
DATE**

17 COMES NOW the Defendant, ISAIAH OUTLAW, by and through his counsel,
18 Raquel Lazo, Assistant Federal Public Defender, and hereby requests an extension to his March 4,
19 2012 self surrender date of sixty (60) days. This request is based upon the attached Points and
20 Authority and all pleadings and papers previously filed herein.

21 DATED this 14th day of February, 2012.

RENE L. VALLADARES
Federal Public Defender

/s/ *Raquel Lazo*
By _____
RAQUEL LAZO
Assistant Federal Public Defender

POINTS AND AUTHORITIES

On November 28, 2011, Mr. Outlaw filed a Motion to extend January 4, 2012 Self Surrender Date (#61). This court granted the motion and extended his self-surrender date to March 4, 2012. See Order (#62).

At the time the Motion (#61) was requested, undersigned counsel had learned that Mr. Outlaw had been designated to FMC Butner in North Carolina. Undersigned counsel had also sent Mr. Outlaw's medical records to the Office of Medical Designation and Transportation (OMDT) on October 25, 2011.

On February 10, 2012, in light of Mr. Outlaw's subsequent surgeries and treatment since his designation, undersigned counsel contacted a BOP representative in an effort to supplement Mr. Outlaw's medical records from October 21, 2011 to the present. Undersigned counsel learned that apparently OMDT had never received any of the records undersigned had previously sent. The only record they appear to have received was a dated letter of prognosis dated July 12, 2011. This was a letter from the UMC physician who evaluated Mr. Outlaw after his first surgery while Mr. Outlaw was still in Marshal custody. *See* Defendant's 2255 Motion (#51) at Exhibit F.

On February 13, 2012, undersigned sent a supplemental letter to OMDT enclosing the original letter dated October 25, 2011 and a CD containing all of Mr. Outlaw's medical records from five (5) of his medical providers. *See* Supplemental OMDT Letter (attached hereto as "Exhibit A"). The CD included both the first set of medical records mailed on October 25, 2011, and Mr. Outlaw's most recent medical records from the period of October 2011 to early January 2012, from City of Hope National Medical Center. Also included on the supplemental CD was an updated medical timeline. On February 14, 2012, as instructed by a BOP representative, this letter was also sent to Dr. James Felton at FCI Englewood.

Undersigned believes that although Mr. Outlaw's designation has been made, it is critical that the BOP have received and reviewed all of Mr. Outlaw's medical records prior to his self-surrender to the facility. A continued self-surrender date will ensure that the BOP can, in fact, provide the necessary treatment and care he requires. This is particularly so in light of Mr. Outlaw's unfortunate diagnosis of two grade IV brain tumors. *See* Surgical Pathology Report dated November

1 8, 2011 (attached hereto as "Exhibit B"). After a set back with surgery, in early December 2011, Mr.
2 Outlaw finally began receiving chemoradiation (whole brain radiation plus partial spinal) in addition
3 to chemotherapy twice daily.

4 Mr. Outlaw continues compliant with all Pretrial Services conditions. He is
5 essentially confined to his home at this time while receiving treatment.

6 **CONCLUSION**

7 Defendant hereby requests the court to extend his self surrender date from March 4,
8 2012 to a date in the future, but no earlier than sixty (60) days.

9 DATED this 14th day of February, 2012.

10 Respectfully submitted,

11 RENE L. VALLADARES
12 Federal Public Defender

13 /s/ *Raquel Lazo*
14 By _____
15 RAQUEL LAZO
16 Assistant Federal Public Defender
17 Counsel for Isaiah Outlaw
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Attorney for ISAIAH OUTLAW

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 ISAIAH OUTLAW,
15 Defendant.

2:10-cr-00455-PMP-LRL

**ORDER ON MOTION TO EXTEND
MARCH 4, 2012 SELF SURRENDER
DATE**

IT IS HEREBY ORDERED that Defendant, ISAIAH OUTLAW's self surrender date of March 4, 2012, be extended to May 3, 2012, before 12:00 noon.

19 DATED this 17th day of February, 2012.

Philip M. Orr
DISTRICT COURT JUDGE

1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 The undersigned hereby certifies that she is an employee of the Law Offices of the
3 Federal Public Defender for the District of Nevada and is a person of such age and discretion as to
4 be competent to serve papers.

5 That on February 14, 2012, she served an electronic copy of the above and foregoing
6 **MOTION AND ORDER TO EXTEND MARCH 4, 2012 SELF SURREND DATE**, by
7 electronic service (ECF) to the person named below:

8 DANIEL BOGDEN
9 United States Attorney
10 NICHOLAS D. DICKINSON
11 Assistant Untied States Attorney
12 333 Las Vegas Blvd. So., 5th Floor
13 Las Vegas, Nevada 89101

14 */s/ Karen Brokaw*

15 Employee of the Federal Public Defender

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